

EXHIBIT 1

([REDACTED])

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Via Email (cbutcher@sidley.com)

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RE: Semcon IP Inc. v. Amazon.com, Inc., Case No. 2:18-cv-00192-JRG

Counsel:

Thank you for attending the meet-and-confer via teleconference on April 8, 2019, to discuss the issues addressed in Semcon IP Inc.'s letter of March 27, 2019. This letter memorializes our discussion and follows up on topics discussed on the call.

Amlogic SoC's: Semcon raised the discrepancy between the quantity of the Amlogic S905Z SoC which Amlogic contends that it sold to Amazon.com, Inc. ("Amazon") [REDACTED] and the quantity of Amazon products sold which contain the S905Z [REDACTED]. Counsel for Amazon stated that the products identified in Amazon's answers to interrogatories, the Fire TV - Gen 3 and Fire TV Cube, are the only products which incorporate the Amlogic S905Z chip, but agreed to consult with Amazon to obtain an explanation for the discrepancy.

Counsel for Amazon represented that Amazon has not purchased any Amlogic S905Y SoCs, and that the only Amlogic SoC purchased by Amazon is the S905Z.

Accused Products: Counsel for Amazon represented that Amazon has identified in its interrogatory answers all of its products that perform DVFS, but Semcon noted that Amazon's answers to interrogatories were expressly limited to "Accused Products." Counsel for Amazon agreed that it would investigate whether specific additional products named by Semcon perform DVFS. Semcon requests that Amazon investigate whether the following products (including all generations, sizes and versions of each product) contain processors that perform DVFS and, if so, update its responses to interrogatories and document production accordingly:

- Echo Dot Kids
- Echo Dot
- Echo Link
- Echo Link Amp
- Echo Spot
- Echo Show
- Echo Sub



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- Echo Auto
- Echo Connect
- Echo Input
- Echo Look
- Echo Plus
- Echo Wall Clock
- Echo Buttons
- Amazon Tap
- Ring
- Amazon Smart Plug
- Alexa Voice Remote
- Kindle Fire 7 Kids Edition
- Kindle Fire HD 8 Kids Edition
- Kindle Fire HD 10 Kids Edition
- Fire TV Stick
- Fire TV Stick 4K
- Fire TV Recast
- Toshiba Smart TV - Fire TV Edition
- Insignia Smart TV - Fire TV Edition

Sales Data: Currently, Amazon has disclosed sales data through November 2018. Counsel for Amazon agreed to request that Amazon update its sales data through a date as close to the present as possible.

Licenses: Semcon noted that Amazon had agreed to amend its response to interrogatory no. 4 to identify relevant licenses, but the supplemental response to that interrogatory does not identify any licenses. Counsel for Amazon stated that it has gathered licenses for production and was awaiting third-party approval to produce the licenses. Counsel for Amazon stated that it expected to produce the licenses in approximately one week. Counsel for Amazon also stated that entry of the protective order requested by Qualcomm may hasten the production. Semcon filed the motion for entry of the protective order later that same day.

Email Custodians: Semcon renewed its request that Amazon supplement its response to interrogatory no. 8 to name a total of twelve (12) email custodians as required by the E-Discovery Order (Dkt. 37). Counsel for Amazon expressed concern that collection of email from twelve custodians would be burdensome. Semcon noted that it would not necessarily seek email discovery from all 12 custodians and did not intend to seek duplicative email productions. Counsel for Amazon agreed to increase the number of identified custodians from two to 12.

Qualcomm Build ID Information: Semcon requested that Amazon provide a complete response to interrogatory no. 9 which is needed to obtain discovery from Qualcomm. Counsel for Amazon stated that it had provided all of the information in its possession, that Semcon should consult the bills of materials produced by Amazon for the requested information, and that Qualcomm should be able to provide the information. Semcon responded that Qualcomm claims that Amazon has the information and must produce it. Semcon stated that it would review the bills of materials and advise if additional information is needed.



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Non-Infringement Contentions: Semcon reiterated that Amazon has not provided any information in response to interrogatory no. 5, and that Semcon is entitled to a complete answer to this interrogatory, including an identification of all facts supporting Amazon's non-infringement positions.

A2Z Development Center Discovery: Counsel for Amazon confirmed that Amazon is providing discovery from its subsidiaries, including A2Z Development Center, Inc. Based on counsel's representations, Semcon will not serve subpoenas on Amazon's subsidiaries requesting relevant discovery in this case, including information responsive to interrogatory no. 2.

Please contact me if you disagree with any of the foregoing. Please also confirm that the requested information will be provided by April 19, 2019.

Regards,

BROWN RUDNICK LLP

Peter Lambrianakos

PL:cjs